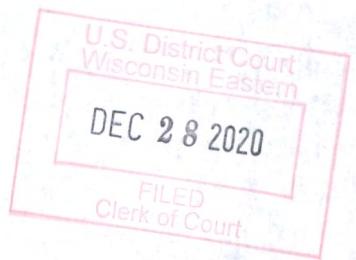


COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN



(Full name of plaintiff(s))

Marcel T. Jackson

v.

Case Number:

20-CV-1911

(to be supplied by Clerk of Court)

(Full name of defendant(s))

Milwaukee County House of Correction

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

949 N. 9th St. Milwaukee, WI 53233

(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Milwaukee County House of Correction
(Name)
is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Milwaukee House of Correction - 8885 S. 68th St., Franklin, WI 53132
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

On March 19th, 2020 I was moved from the Milwaukee County Jail to
House of Correction, under the guise of saving space to accomodate single
cells - The conditions were not sufficient to provide adequate
preventative protection against Covid-19. It is the first
"inmate right" in the H.O.C handbook to be protected from danger
and disease. Between March 26th - April 1st I filed several paper
and Kiosk grievances addressing social, cleaning/sanitary, protective
and preventative concerns. No relief granted. Shortly after the situation
worsened, the officers began wearing masks... we were not given
masks or allowed to cover our faces. 2 individuals in my dorm
were taken out for undisclosed health reasons. still no protective

measures were taken. On April 4th I organized a 38 man petition referencing cleaning concerns, mask requests, as well as civil rights issues; addressed to the Supreme Court of WI. On April 12th, 2020 we were given masks - We were required to keep the same single use surgical mask for 1 week (which was policy until my 5th week of Quarantine) before we were given a replacement. No adequate cleaning measures or supplies were provided. I got very sick, and it did not subside. I made it known nothing was done. On April 18th, 2020 the National Guard came and tested everyone. My results were inconclusive. I was retested by WellPath on April 20th. On April 22nd the positive result was returned and I was moved to Quarantine. I remained in Quarantine for 6 weeks until I was moved back to MCI on May 28th, 2020 (untested). I still experience adverse health phenomena; as I was never properly treated for my contraction of SARS-CoV-2. Milwaukee House of Correction is directly responsible for my contraction of SARS-CoV-2 a.k.a Covid-19 due to their negligence, refusal of administrative remedy requests, the direct breaking of their own policies, not adhering to Gov. Evers orders, directly damaging actions, as well as other issues. They are liable, legally and ethically to protect inmates, they did not.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

As I am not motivated by malice or greed, I aim to be modest in my request. I am seeking \$300,000 in awarded money / compensation, as well as any additional awards for emotional pain, suffering, inconvenience, mental anguish, Loss of enjoyment / quality of life.
As an additional stipulation to promote resolution and compromise; in the instance of a settlement, I am willing to waive my right to initiate and/or participate in any class action suits - in the present or future, as well as any future suits based on the same or related claims.

E. JURY DEMAND

I want a jury to hear my case.

- YES

- NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 22nd day of December 2020.

Respectfully Submitted,

Mark J. Jackson
Signature of Plaintiff

2020002734

Plaintiff's Prisoner ID Number

Milwaukee County Jail

949 N. 9th st. Milwaukee, WI 53233

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE

- I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.
- I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.